

Figure No. 2



TRANSFORMER SERVICE, INC.

REGIONAL DR. • P.O. BOX 1077 • CONCORD, N.H. 03301-1077
(603) 224-4006

October 2, 1987

Cumberland Corporation
South Windham,
Maine 04082

RE: PCB Analyses Results

Gentlemen:

The following are the results of the PCB Analyses performed on your 28 oil samples that were received in our Laboratory on September 2, 1987, and tested on September 24, 1987.

| <u>SAMPLE I.D.</u> | <u>PCB CONTENT (PPM)</u> | <u>SAMPLE I.D.</u> | <u>PCB CONTENT (PPM)</u> |
|--------------------|--------------------------|--------------------|--------------------------|
| 1 | *ND | 22 | *ND |
| 2 | *ND | 25 | *ND |
| 3 | *ND | 27 | *ND |
| 4 | *ND | 28 | *ND |
| 5 | *ND | 29 | *ND |
| 6 | *ND | 30 | *ND |
| 7 | *ND | 31 | 2 |
| 8 | *ND | 32 | *ND |
| 10 | 6 | 34 | *ND |
| 11 | *ND | 36 | 3 |
| 13 | *ND | 37 | 7 |
| 15 | 3 | 38 | 3 |
| 16 | *ND | 39 | *ND |
| 19 | *ND | 40 | *ND |

*ND - NON-DETECTABLE

(Continued)

VIL_RESP00816

Cumberland Corporation
October 2, 1987
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Based on the PCB results performed on these sample, we are enclosing 28 BLUE "NON PCB" labels for your to affix to these items.

Should you have any questions concerning these results, please do not hesitate to contact me at our office.

Thank you for giving us this opportunity to be of service to you.

Sincerely,



Robert E. Thompson
Sales Representative

RET/ksl

Enclosures

VIL_RESP00817

Memorandum

To: Renee Lewis, Questor
From: Todd Coffin
Re: Preliminary Report on Test Results at 7 Depot Street, January 13, 2004
Date: February 3, 2004.

As you are aware, Jacques Whitford conducted follow-up soil testing at the 7 Depot Street site on January 13, 2004. Prior test results indicated elevated levels of PCBs in a floor drain in the basement of the building. This drain was observed to contain water, and appears to have an open bottom and/or sides allowing communication with the subsurface environment.

A PCB concentration of 173 ppm was detected in sediment sampled from the drain on November 25, 2003. Because of the potential for the drain to discharge to the outside subsurface environment, follow-up sampling was conducted on January 13, 2004. Results of the November sampling event, which included a number of other surface sample locations inside and outside the building, were presented to you in a memorandum dated December 17, 2003.

The limited sampling event of January 13 focused on the area around the floor drain (ground level of mill) and shallow subsurface soils along the south side of the former mill building where the floor drain appears to discharge. We re-sampled soils from the floor drain to confirm the earlier detection, sampled material from three piles of soil and debris in the vicinity of the interior floor drain, and sampled soil from an approximate 18-inch depth outside the mill, in line with the floor drain. Each sample was tested for PCBs. The sample from the floor drain, and the sample from exterior soils near the floor drain were also sampled for RCRA metals.

The attached figure shows the locations of the samples and PCB concentrations. The concentrations ranged from 71 ppm (soil pile "A") to 262 ppm (floor drain sediment), well above the 1 ppm human-health based clean-up guideline under the Toxic Substances Control Act (TSCA). We detected 113 ppm PCBs in the shallow subsurface soils collected outside the building (1.5-foot depth), in line with the floor drain. The exterior sample was collected at a depth at, or slightly below, the water table. A slight sheen was observed on the soils sampled, and on the water table.

Metals testing identified arsenic at a concentration above the residential-based remedial action guideline published by DEP. The concentration detected in the exterior soil sample (1.0-foot depth) in line with the floor drain was 13.6 ppm; the remedial action guideline is 10 ppm. Arsenic is a naturally occurring element in Maine soils and bedrock, and may not be the result of operations at the site. Arsenic was detected above

VIL_RESP00818

the DEP guideline in four other previous sample locations at the site. The floor drain sediment contained arsenic at a concentration of 17.5 ppm.

Jacques Whitford recently sampled soils between the river and the exterior sample location found to contain 113 ppm PCBs. The data is expected to be available on February 4, 2004 and will assist the team in assessing the potential for impacts to the river.

Colby



ATHLETIC DEPARTMENT
4900 Mayflower Hill
Waterville, ME 04901-8841
TEL 207-872-3364
FAX 207-872-3420
athletics@colby.edu

Fax Cover Sheet

To: *Renee Lewis*

Fax#: *772-7011*

From: *Todd Coffin*

Date: *2.3.04*

Total number of pages (including cover sheet):

Notes/Comments:

Figure/sketch to accompany the memo.

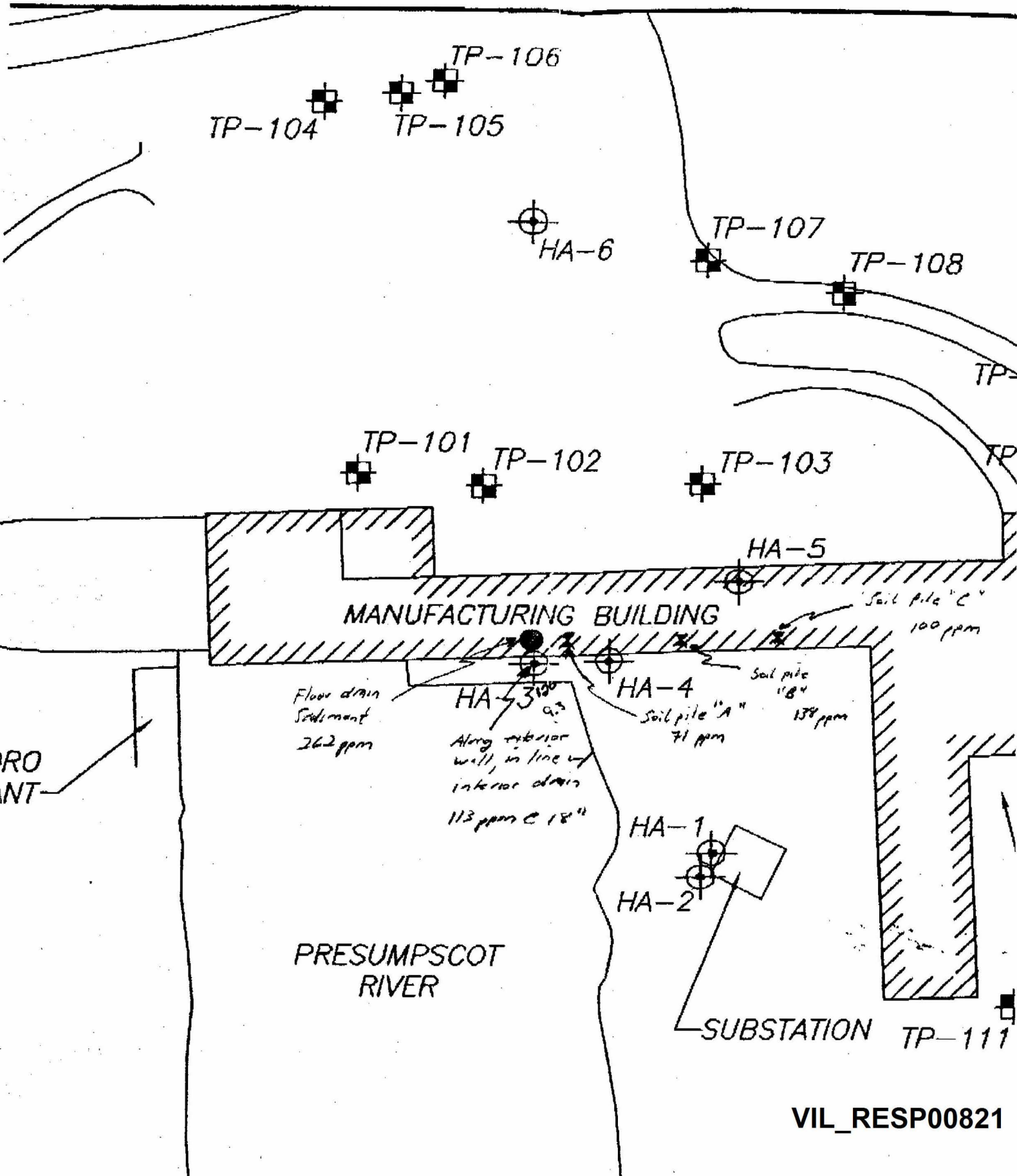
-Todd



VIL_RESP00820

-Preliminary -

-Locations are approximate



VIL_RESP00821

Memorandum

To: Renee Lewis, Questor
From: Todd Coffin, Jacques Whitford Company, Inc.
Subject: Preliminary Results for Supplemental PCB Testing
Date: December 17, 2003

I will deliver to your office around 9:00 am a site plan showing new surface sample locations and tables with chemical test results.

Our preliminary findings of the supplemental PCB testing follow.

- 1) Additional testing of soils was conducted in the vicinity of oil-stained surface soils near electrical equipment (corresponds to hand auger location HA-4). Surface soil samples collected 10 feet east of HA-4 (SS11) and 10 feet south of HA-4 (SS12) were non-detect for PCBs. Surface sample SS13, 10 feet west of HA-4, contained total PCBs at 0.135 ppm (135 ppb). The Toxic Substance Control Act (TSCA) clean-up guideline for protection of human health is 1 ppm total PCBs. The testing indicates limited aerial extent of PCB impacts at HA-4.

PCB concentrations also appear to decrease with depth at the location of HA-4, given detection of 2.8 ppm total PCBs in surface sample SS14 (0-0.5 ft), 1.8 ppm in sample SS15 (0.5-1 ft), and 0.63 ppm detected in the previously collected sample HA-4 (1-2 ft).

- 2) Additional testing of soils was completed in the vicinity of the "cut out" concrete on the ground floor of the former mill (hand auger location HA-5). Soils sampled beneath concrete flooring 10 feet south of HA-5 (SS1) contained 0.09 total PCBs. Soils beneath concrete next to the interior building wall 5 feet north of HA-5 (SS2) contained 0.817 total PCBs. Soils beneath concrete 10 feet east of HA-5 (SS3) contained non-detectable PCB concentrations. These data indicate limited lateral spreading of PCBs in surface soils below the concrete floor.

Test data indicate decreasing PCB concentrations with depth at HA-5. The surface soil sample SS5 (0-0.5 ft) contained 77 ppm total PCBs, while the previously collected sample HA-5 (0.5 to 1 ft) contained 36 ppm total PCBs.

- 3) Total PCBs at 173 ppm were detected in sediments collected from a floor drain (SS6). The floor drain is located on the ground floor of the building and may discharge to the river embankment on the south side of the former mill building. The drain does not daylight on the exterior, possibly due to outlet burial from build up of sediment along the river bank.

The National Oceanic and Atmospheric Administration (NOAA) has established total PCB screening levels for protection of aquatic organisms. The Threshold Effects Level (TEL) for freshwater sediment is 0.034 ppm; the Probable Effects Level (PEL) is 0.27 ppm.

Additional testing is planned for sediment in the vicinity of the suspected drain outlet. Note that the PCB screening levels for protection of aquatic organisms are lower than the TSCA-based PCB levels for protection of human health.

- 4) Oily sludge buildup on concrete floors in the maintenance shop area was tested for PCBs in light of proposed building clean-up activities. Samples of sludge from samples SS7-SS10 contained total PCBs ranging from 5 to 16 ppm. These results indicate the need for proper handling and disposal of building

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clean-up waste based on PCB concentrations, at a minimum. Additional testing of interior building surfaces for PCBs will be conducted following clean-up work.

7 Depot Street
Windham, Maine
Soil Analytical Results

| Analyte | Maine DEP | TP-101 | TP-102 | TP-102 | TP-103 | TP-104 | TP-107 | TP-107 | TP-110 |
|---------------------------|-------------|----------|----------|----------|----------|----------|----------|----------|----------|
| Depth of Sample | Residential | 8-10' | 0-2' | 4-6' | 0-2' | 10-12' | 2-4' | 8-10' | 0-2' |
| Date Collected | Guideline | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 |
| DRO (mg/kg) | | | | | | | | | |
| DIESEL RANGE ORGANICS | | 10 | NA | NA | NA | U 6.8 | NA | 9 | NA |
| Metals (mg/kg) | | | | | | | | | |
| ARSENIC | 10 | NA | 16 | 5 | 11 | NA | 3 | NA | 16 |
| BARIUM | 10,000 | NA | 45 | 98 | 75 | NA | 87 | NA | 81 |
| CADMIUM | 27 | NA | U 8.78 | U 1.00 | U 4.69 | NA | U 1.06 | NA | U 1.00 |
| CHROMIUM VI | 950 | NA | 266 | 7 | 133 | NA | 18 | NA | 16 |
| LEAD | 375 | NA | 150 | 12 | 164 | NA | 24 | NA | 49 |
| MERCURY | 60 | NA | 0 | U 0.048 | 0 | NA | 0 | NA | 0 |
| SELENIUM | 950 | NA | U 8.8 | U 1.0 | U 4.7 | NA | U 1.1 | NA | U 1.0 |
| SILVER | 950 | NA | U 1.5 | U 1.5 | U 1.5 | NA | U 1.6 | NA | U 1.5 |
| PCBs (ug/kg) | | | | | | | | | |
| AROCLOR-1016 | 100 | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1221 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1232 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1242 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1248 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1254 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| AROCLOR-1260 | * | NA | NA | NA | NA | NA | NA | NA | NA |
| Total PCBs (sum of above) | 2,200 | NA | NA | NA | NA | NA | NA | NA | NA |
| VOCs (ug/kg) | | | | | | | | | |
| METHYLENE CHLORIDE | 13,000 | 17 | NA | NA | NA | 7 | NA | 10 | NA |
| TRICHLOROFLUOROMETHANE | * | 190 | NA | NA | NA | 70 | NA | 68 | NA |
| Other Compounds | | | | | | | | | |
| TOTAL SOLIDS (%) | * | 73 | 92 | 84 | 88 | 74 | 84 | 80 | 90 |

Notes:

* Regulatory Guideline Not Available

Bold values indicate an exceedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

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7 Depot Street
Windham, Maine
Soil Analytical Results

| Analyte | Maine DEP | TP-111 | TP-112 | HA-1 | HA-2 | HA-4 | HA-5 | HA-6 | SS1 |
|---------------------------|-------------|----------|----------|----------|----------|----------|----------|----------|------------|
| Depth of Sample | Residential | 2-4' | 0-2' | 0-0.3' | 0-0.3' | 1-2' | 0.5-1' | 0-0.3' | 0-0.5' |
| Date Collected | Guideline | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/4/2003 | 8/8/2003 | 8/4/2003 | 11/25/2003 |
| DRO (mg/kg) | | | | | | | | | |
| DIESEL RANGE ORGANICS | | 29 | NA | 63 | NA | 2,900 | 3,300 | 9,100 | NA |
| Metals (mg/kg) | | | | | | | | | |
| ARSENIC | 10 | NA | 22 | NA | NA | NA | NA | NA | NA |
| BARIUM | 10,000 | NA | 251 | NA | NA | NA | NA | NA | NA |
| CADMIUM | 27 | NA | U 2.21 | NA | NA | NA | NA | NA | NA |
| CHROMIUM VI | 950 | NA | 55 | NA | NA | NA | NA | NA | NA |
| LEAD | 375 | NA | 338 | NA | NA | NA | NA | NA | NA |
| MERCURY | 60 | NA | 1 | NA | NA | NA | NA | NA | NA |
| SELENIUM | 950 | NA | U 2.2 | NA | NA | NA | NA | NA | NA |
| SILVER | 950 | NA | U 1.6 | NA | NA | NA | NA | NA | NA |
| PCBs (ug/kg) | | | | | | | | | |
| AROCLOR-1016 | 100 | NA | NA | U 20 | U 20 | U 18 | U 200 | NA | U 39.0 |
| AROCLOR-1221 | * | NA | NA | U 20 | U 20 | U 18 | U 200 | NA | U 39.0 |
| AROCLOR-1232 | * | NA | NA | U 20 | U 20 | U 18 | U 200 | NA | U 39.0 |
| AROCLOR-1242 | * | NA | NA | U 20 | U 20 | 99 | U 200 | NA | U 39.0 |
| AROCLOR-1248 | * | NA | NA | U 20 | U 20 | U 18 | U 200 | NA | U 39.0 |
| AROCLOR-1254 | * | NA | NA | 79 | 56 | 530 | 24,000 | NA | 89.9 |
| AROCLOR-1260 | * | NA | NA | 40 | U 20 | U 18 | 12,000 | NA | U 39.0 |
| Total PCBs (sum of above) | 2,200 | NA | NA | 119 | 56 | 629 | 36,000 | NA | 90 |
| VOCs (ug/kg) | | | | | | | | | |
| METHYLENE CHLORIDE | 13,000 | U6 | NA | NA | NA | NA | NA | 6 | NA |
| TRICHLOROFLUOROMETHANE | * | 61 | NA | NA | NA | NA | NA | 48 | NA |
| Other Compounds | | | | | | | | | |
| TOTAL SOLIDS (%) | * | 84 | 79 | 85 | 83 | 93 | 84 | 96 | NA |

Notes:

* Regulatory Guideline Not Available

Bold values indicate an exceedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

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7 Depot Street
Windham, Maine
Soil Analytical Results

| Analyte | Maine DEP | SS2 | SS3 | SS5 | SS6 | SS7 | SS8 | SS9 |
|---------------------------|-------------|------------|------------|------------|------------|------------|------------|------------|
| Depth of Sample | Residential | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' |
| Date Collected | Guideline | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 |
| DRO (mg/kg) | | | | | | | | |
| DIESEL RANGE ORGANICS | | NA | NA | NA | NA | NA | NA | NA |
| Metals (mg/kg) | | | | | | | | |
| ARSENIC | 10 | NA | NA | NA | NA | NA | NA | NA |
| BARIUM | 10,000 | NA | NA | NA | NA | NA | NA | NA |
| CADMIUM | 27 | NA | NA | NA | NA | NA | NA | NA |
| CHROMIUM VI | 950 | NA | NA | NA | NA | NA | NA | NA |
| LEAD | 375 | NA | NA | NA | NA | NA | NA | NA |
| MERCURY | 60 | NA | NA | NA | NA | NA | NA | NA |
| SELENIUM | 950 | NA | NA | NA | NA | NA | NA | NA |
| SILVER | 950 | NA | NA | NA | NA | NA | NA | NA |
| PCBs (ug/kg) | | | | | | | | |
| AROCLOR-1016 | 100 | U 36.1 | U 40 | U 39.2 | U 48.2 | U 33.1 | U 54.6 | 3,210 |
| AROCLOR-1221 | * | U 36.1 | U 40 | U 39.2 | U 48.2 | U 33.1 | U 54.6 | U 47.6 |
| AROCLOR-1232 | * | U 36.1 | U 40 | U 39.2 | U 48.2 | U 33.1 | U 54.6 | U 47.6 |
| AROCLOR-1242 | * | U 36.1 | U 40 | U 39.2 | U 48.2 | U 33.1 | U 54.6 | U 47.6 |
| AROCLOR-1248 | * | U 36.1 | U 40 | U 39.2 | U 48.2 | U 33.1 | U 54.6 | U 47.6 |
| AROCLOR-1254 | * | 500 | U 40 | 44,800 | 120,000 | 13,100 | 11,200 | 9,590 |
| AROCLOR-1260 | * | 317 | U 40 | 32,200 | 53,500 | U 33.1 | U 54.6 | 3,540 |
| Total PCBs (sum of above) | 2,200 | 817 | | 77,000 | 173,500 | 13,100 | 11,200 | 16,340 |
| VOCs (ug/kg) | | | | | | | | |
| METHYLENE CHLORIDE | 13,000 | NA | NA | NA | NA | NA | NA | NA |
| TRICHLOROFLUOROMETHANE | * | NA | NA | NA | NA | NA | NA | NA |
| Other Compounds | | | | | | | | |
| TOTAL SOLIDS (%) | * | NA | NA | NA | NA | NA | NA | NA |

Notes:

* Regulatory Guideline Not Available

Bold values indicate an exceedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

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VIL_RESP00826

7 Depot Street
Windham, Maine
Soil Analytical Results

| Analyte | Maine DEP | SS10 | SS11 | SS12 | SS13 | SS14 | SS15 |
|---------------------------|-------------|------------|------------|------------|------------|------------|------------|
| Depth of Sample | Residential | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' | 0-0.5' | 0.5-1.0' |
| Date Collected | Guideline | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 | 11/25/2003 |
| DRO (mg/kg) | | | | | | | |
| DIESEL RANGE ORGANICS | | NA | NA | NA | NA | NA | NA |
| Metals (mg/kg) | | | | | | | |
| ARSENIC | 10 | NA | NA | NA | NA | NA | NA |
| BARIUM | 10,000 | NA | NA | NA | NA | NA | NA |
| CADMIUM | 27 | NA | NA | NA | NA | NA | NA |
| CHROMIUM VI | 950 | NA | NA | NA | NA | NA | NA |
| LEAD | 375 | NA | NA | NA | NA | NA | NA |
| MERCURY | 60 | NA | NA | NA | NA | NA | NA |
| SELENIUM | 950 | NA | NA | NA | NA | NA | NA |
| SILVER | 950 | NA | NA | NA | NA | NA | NA |
| PCBs (ug/kg) | | | | | | | |
| AROCLOR-1016 | 100 | U 43.9 | U 32.2 | U 32.5 | U 35.1 | 499 | 222 |
| AROCLOR-1221 | * | U 43.9 | U 32.2 | U 32.5 | U 35.1 | U 43.8 | U 37.2 |
| AROCLOR-1232 | * | U 43.9 | U 32.2 | U 32.5 | U 35.1 | U 43.8 | U 37.2 |
| AROCLOR-1242 | * | U 43.9 | U 32.2 | U 32.5 | U 35.1 | U 43.8 | U 37.2 |
| AROCLOR-1248 | * | U 43.9 | U 32.2 | U 32.5 | U 35.1 | U 43.8 | U 37.2 |
| AROCLOR-1254 | * | 5,100 | U 32.2 | U 32.5 | 135 | 1770 | 1170 |
| AROCLOR-1260 | * | U 43.9 | U 32.2 | U 32.5 | U 35.1 | 532 | 445 |
| Total PCBs (sum of above) | 2,200 | 5,100 | | | 135 | 2,801 | 1,837 |
| VOCs (ug/kg) | | | | | | | |
| METHYLENE CHLORIDE | 13,000 | NA | NA | NA | NA | NA | NA |
| TRICHLOROFLUOROMETHANE | * | NA | NA | NA | NA | NA | NA |
| Other Compounds | | | | | | | |
| TOTAL SOLIDS (%) | * | NA | NA | NA | NA | NA | NA |

Notes:

* Regulatory Guideline Not Available

Bold values indicate an exceedance of the Regulatory Guideline

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

NA = Not Analyzed

VIL_RESP00827

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ASBESTOS SURVEY REPORT

**Former Industrial Building
7 Depot Street
Windham, Maine**

Prepared for

Questor, Inc.
50 Monument Square, 2nd floor
Portland ME, USA 04101

Prepared by

Jacques Whitford Company, Inc.
75 Pearl Street
Suite 410
Portland, Maine 04101
Phone: (207) 761-7790
Fax: (207) 761-7631

Jacques Whitford Reference: Project No. MEP03102

February 21, 2004

VIL_RESP00828

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Appendix A Bulk Sampling Results

Appendix B Chart of ACM (including type, location, amount, condition and content)

Appendix C Glossary of Terms

Appendix D Figures

1.0 Introduction

This limited, asbestos building survey report is being submitted on behalf of:

Questor, Inc.
50 Monument Square, 2nd floor
Portland ME, USA 04101

in order to determine the location and approximate quantity of potential asbestos containing materials (ACMs) that are associated with the former industrial building located at 7 Depot Street in Windham, Maine, which is reportedly scheduled to be demolished. At the time of the survey, Jacques Whitford Company, Inc. (Jacques Whitford) noted that the roof of the building was deteriorating, and we did not attempt to gain direct access to the roof. Jacques Whitford sampled pieces of the roof that had fallen on the floor in several areas. Jacques Whitford also observed several areas throughout the second floor of the subject property building that contained transite debris, which tested positive for asbestos. Jacques Whitford could not quantify the piles of transite debris, due to the fact that snow was present from the previously mentioned collapsed roof areas.

Qualified personnel conducted the limited asbestos survey following procedures generally accepted and recommended by the United States Environmental Protection Agency (US EPA), the United States Occupational Safety Health Administration (OSHA) and the Maine Department of Environmental Protection (MEDEP). Jacques Whitford collected and had laboratory analysis performed on an adequate number of suspect bulk material samples to ensure accurate results.

The suspect ACMs sampled during the survey of the subject property building, included various 12" x 12" vinyl composite tile (VCT) and associated mastic (tile glue), textured wall material, cove base molding, sheetrock, joint compound, textured ceiling material, various 2' x 4' ceiling tiles, 12" x 12" ceiling tiles, various window glazing, various window caulking, transite boards, exterior corrugated transite panels, interior boiler thermal system insulation (TSI), rolled asphalt roofing shingles, and composite asphalt roofing felts.

Upon sampling and analysis, materials that were found to contain at least 1% asbestos, and are thereby considered asbestos containing, are summarized in Section 4.0 of this survey report.

A licensed asbestos abatement contractor should appropriately abate all of the identified ACMs prior to being disturbed during proposed demolition activities. Jacques Whitford also recommends that the roof of the building be fully inspected and sampled prior to being disturbed during proposed demolition activities, or assumed to be positive for asbestos.

VIL_RESP00830

2.0 Bulk Sampling Information

The suspect ACM analyzed, were characterized by bulk samples collected by Brian A. Piccolo (Maine Asbestos Inspector Certification No. AI 0417) on Tuesday, December 16, 2003. Jacques Whitford has made every effort to characterize all visible and readily accessible suspect ACMs within the interior/exterior areas of the subject property building. However, should construction workers encounter and/or need to disturb any product(s) suspected as being ACM, that have not been previously identified or sampled by Jacques Whitford, during any demolition activities in the future, all proper precautions should be taken to ensure these materials are appropriately characterized and handled accordingly. At the time of the survey, Jacques Whitford noted that the roof of the building was deteriorating, and we did not attempt to gain direct access to the roof. Jacques Whitford sampled pieces of the roof that had fallen on the floor in several areas. Jacques Whitford also observed several areas throughout the second floor of the subject property building that contained transite debris, which tested positive for asbestos. Jacques Whitford could not quantify the piles of transite debris, due to the fact that snow was present from the previously mentioned collapsed roof areas.

Inspection procedures included a visual inspection of suspect ACM identified by Jacques Whitford personnel. This visual inspection included the touching of identified suspect ACM to determine its friability, (when dry, may be crushed, pulverized, or reduced to powder by hand pressure), identification of homogeneous areas of identified suspect ACM, approximate quantification of identified suspect ACM, collection of bulk samples for analysis, and assessment of the condition of suspect ACM. The United States Environmental Protection Agency's *Managing Asbestos in Place, A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, was used as a guide for this survey.

Each homogenous area of suspect ACM was assessed to determine the asbestos hazard. A homogeneous area is defined as a material that is uniform in color or texture with a similar appearance and an application on similar components. Factors considered when assessing homogeneous area hazards include the friability of the material, the condition of the material including type, severity, and extent of damage, and accessibility of the material and potential for further damage and disturbance.

Sampling methods were designed to minimize damage to the ACM and subsequent fiber release. Samples were collected using disposable samplers, similar to a cork borer. Samples were extracted to the substrate and ejected into a prelabeled asbestos sample bag. The bag was then sealed, recorded in a sample logbook and sent to the laboratory for analysis. Any remaining debris from the sampling area was cleaned with wet towels, which were discarded into a plastic bag and disposed of properly. Any voids left in the sampled

VIL_RESP00831

area were filled with Wonder Makers Wonder Fill™ Product No.01-8975, to eliminate the possibility of fiber release.

Each of the collected samples were submitted to and analyzed by ProScience Analytical Services, Inc. (ProScience) of Woburn, Massachusetts. ProScience is accredited through the National Voluntary Laboratory Accreditation Program (NVLAP# 200090-0), the American Industrial Hygiene Association (AIHA# 22559) and with the MEDEP (LA-0056). All samples were analyzed in accordance with U.S. Environmental Protection Agency (EPA) recommended protocol ("Follow-up to the Interim Method for Determination of Asbestos in Bulk Insulation Samples" - EPA 600/R-93/116 method "Visual Estimate") using polarized light microscopy (PLM) supplemented by dispersion staining techniques. The Visual Estimate quantitative method is generally used for determining the percentage of asbestos and other components of the sample. The "Point Counting" method may also be used upon client request or at the analyst's discretion. The Point Counting method is usually recommended when the sample contains less than 5% asbestos by Visual Estimate.

It should be noted that instructions were provided to the laboratory to stop at the first positive result obtained for each homogenous suspect material sampled.

Appendix B contains a chain-of-custody and a copy of the bulk sampling results, as provided by ProScience. **Appendix C** contains a table listing the results of each sample taken, indicating the sample number/type, the approximate quantities present, the condition of the material, and the actual asbestos content or makeup, if any, in each sample analyzed.

3.0 Background Air Sampling

As the scope of this project consisted of an asbestos facility survey only, no background air sampling was conducted during this survey.

4.0 Description of Identified Areas and Suspect Materials

This asbestos building survey has been completed for the proposed demolition of the former industrial building, located at 7 Depot Street in Windham, Maine.

One hundred and four (104) samples amongst twenty-eight (28) different homogenous materials were collected from the subject property building with instructions to the laboratory to stop at the first positive result obtained for each homogeneous material. Based on these instructions, sixty (66) samples were laboratory analyzed.

The following paragraphs contain information regarding the suspect materials observed during the survey that tested positive for asbestos. These paragraphs contain information pertaining to actual locations and estimated quantities.

- Samples 5A – 5C: Joint Compound

This material was found to be associated with the sheetrock in the second and third floor office areas of the subject property building. The majority of this material was found to be in good/fair condition. Jacques Whitford personnel was unable to quantify the total amount of this material. However, Jacques Whitford did observe approximately 3,100 square feet of sheetrock associated with this material. Based on observations, it is Jacques Whitford's opinion that this material is friable. Jacques Whitford recommends that the joint compound be reanalyzed using more enhanced analytical methods, to insure that the joint compound is actually asbestos containing. PLM analysis had revealed a 2% chrysotile asbestos concentration.

- Samples 6A – 6C: Textured Wall Material

This material was found to be associated with the walls located in the third floor stairwell of the subject property building (see **Figure 1**). The majority of this material was found to be in fair condition. Based on field measurements by Jacques Whitford, there is approximately 385 square feet of this material. Based on observations, it is Jacques Whitford's opinion that this material is friable. Jacques Whitford recommends that the textured wall material be reanalyzed using more enhanced analytical methods, to insure that the textured wall material is actually asbestos containing. PLM analysis had revealed a 2% chrysotile asbestos concentration.

- Samples 7A – 7E & 7AM – 7EM: Brown 12" x 12" Vinyl Asbestos Tile (VAT) and Associated Mastic

These materials were found to cover the floor in the third floor office area of the subject property building (see **Figure 1**). The majority of these materials were found to be in poor condition. Based on field measurements by Jacques Whitford, there is approximately 1,670 square feet of these materials. Based on observations, it is Jacques Whitford's opinion that these materials would be considered non-friable, but could be rendered friable with disturbance.

- Samples 8A – 8C: Black 12"x12" VAT

This material was found to cover the floor in the stairwell area on the third floor of the subject property building (see **Figure 1**). The majority of this material was found to be in good/fair condition. Based on field measurements by Jacques Whitford, there is approximately 120 square feet of this material. Based on observations, it is Jacques Whitford's opinion that these materials would be considered non-friable, but could be rendered friable with disturbance. Jacques Whitford recommends that the black 12" x 12"

VAT be reanalyzed using more enhanced analytical methods, to insure that the black 12" x 12" VAT is actually asbestos containing. PLM analysis had revealed a 3% chrysotile asbestos concentration.

- Samples 10A – 10C: Parking Lot-side Window Glazing

This material was found to be associated with the parking lot-side windows in the second and third floor office areas within the subject property building. The majority of this material was found to be in good/fair condition. Based on field observations by Jacques Whitford, there is a total of fourteen windows, approximately 1,400 linear feet (~100 lf/window) of this material. Based on observations, it is Jacques Whitford's opinion that material could be rendered friable with disturbance.

- Samples 11A – 11C: Parking Lot-side Window Caulking

This material was found to be associated with the parking lot-side windows in the second and third floor office areas within the subject property building. The majority of this material was found to be in good/fair condition. Based on field observations by Jacques Whitford, there is a total of fourteen windows, approximately 322 linear feet (~23 lf/window) of this material. Based on observations, it is Jacques Whitford's opinion that material could be rendered friable with disturbance.

- Samples 13A – 13C & 13AM – 13CM: White 12" x 12" VAT and Associated Mastic

These materials were found to cover the floor in one of the second floor office areas of the subject property building (see **Figure 2**). The majority of these materials were found to be in fair condition. Based on field measurements by Jacques Whitford, there is approximately 300 square feet of these materials. Based on observations, it is Jacques Whitford's opinion that these materials would be considered non-friable, but could be rendered friable with disturbance.

- Samples 14A – 14E: Transite Boards

This material was found to be utilized for walls in areas of the first and second floors of the subject property building, (see **Figure 2 and 3**). This material was also utilized with the manufacturing process, in the form of a box that was placed into the machines (see **Figure 2**). It should be noted that transite debris was observed throughout the second floor of the subject property building. The majority of this material was found to be in good/fair condition. Based on field measurements by Jacques Whitford, there is approximately 2,300 square feet of this material. Based on observations, it is Jacques

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Whitford's opinion that this material is non-friable, but could be rendered friable with disturbance.

- Samples 15A – 15C: Textured Ceiling Material

This material was found to be associated with the ceiling located in one of the second floor office areas of the subject property building (see **Figure 2**). The majority of this material was found to be in fair condition. Based on field measurements by Jacques Whitford, there is approximately 450 square feet of this material. Based on observations, it is Jacques Whitford's opinion that this material is friable. Jacques Whitford recommends that the textured wall material be reanalyzed using more enhanced analytical methods, to insure that the textured wall material is actually asbestos containing. PLM analysis had revealed a 2% chrysotile asbestos concentration.

- Samples 17A – 17C: Second Floor Window Glazing

This material was found to be associated with the windows in the manufacturing portion of the second floor within the subject property building. The majority of this material was found to be in good/fair condition. Based on field observations by Jacques Whitford, there is a total of fifty-one windows, approximately 14,688 linear feet (~288 lf/window) of this material. Based on observations, it is Jacques Whitford's opinion that material could be rendered friable with disturbance. Jacques Whitford recommends that the second floor window glazing be reanalyzed using more enhanced analytical methods, to insure that the second floor window glazing is actually asbestos containing. PLM analysis had revealed a 2% chrysotile asbestos concentration.

- Samples 20A – 20G: Exterior Corrugated Transite Panel

This material was found to be utilized as the exterior walls and roof of the southeastern warehouse portion of the subject property building (see **Figure 2**). The majority of this material was found to be in good/fair condition. Based on field measurements by Jacques Whitford, there is approximately 10,500 square feet of this material. Based on observations, it is Jacques Whitford's opinion that this material is non-friable, but could be rendered friable with disturbance.

- Samples 24A – 24C: First Floor/Basement Small Wood Framed Window Glazing

This material was found to be associated with the small wood framed windows located in the air circulator room of the first floor/basement of the subject property building. The majority of this material was found to be in good/fair condition. Based on field observations by